Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 10/23/2020 3:18:26 AM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1@navy.mil]
CC: Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA [matthew.liscio@navy.mil]; Edwards, Zachary L CIV USN NAVSEA DET RASO VA (USA [zachary.edwards@navy.mil]; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA [thomas.macchiarella@navy.mil]; Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA [paul.stoick@navy.mil]; Craig Bias [cbias@remwerks.com]; Chesnutt, John [Chesnutt.John@epa.gov]
Subject: FW: Discuss RESRAD Build and BRPG
Attachments: Dust_Ingestion_EFH_Update_PRGs_to Navy.xlsx

Attached is a spreadsheet that responds to action item #5. The table referenced in the spreadsheet (Table 5-13) with the updated values from the EPA Exposure Factors Handbook (described as proposed values in the spreadsheet) is available at https://www.epa.gov/expobox/about-exposure-factors-handbook (Chapter 5).

Wayne Praskins | Superfund Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne St. (SFD-7-3)
San Francisco, CA 94105
415-972-3181

From: Praskins, Wayne
Sent: Thursday, October 22, 2020 5:54 PM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Cc: Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA <matthew.liscio@navy.mil>; Edwards, Zachary L CIV USN NAVSEA DET RASO VA (USA <zachary.edwards@navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA <thomas.macchiarella@navy.mil>; Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA <paul.stoick@navy.mil>; Craig Bias <cbias@remwerks.com>; Chesnutt, John <Chesnutt.John@epa.gov>
Subject: FW: Discuss RESRAD Build and BRPG

Derek -

Please see proposed changes in red and strikeout. [Notes are in italics]

Wayne Praskins | Superfund Project Manager
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San Francisco, CA 94105
415-972-3181

From: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Sent: Thursday, October 22, 2020 9:33 AM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil>; Edwards, Zachary L CIV USN NAVSEA DET RASO VA (USA) <zachary.edwards@navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>; Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA) <paul.stoick@navy.mil>; Craig Bias <cbias@remwerks.com>
Subject: RE: Discuss RESRAD Build and BRPG

Here is what I wrote down with respect to action items. Please make any changes and send back by COB today. I plan on sending this to the group.

General summary –

The Navy and EPA are both going to evaluate some specific technical items and get back to the group (listed in action items below).
The Navy and EPA ~~are both questioning~~ discussed how well the CSM for HPNS ~~and will discuss if it needs to be changed to better~~ represents actual site conditions.
The Navy uses RESRAD and believes that it is the appropriate tool to use - industry accepted and provides an accurate evaluation of risk and cleanup numbers.
The EPA generally uses the BPRG calculator at CERCLA sites to evaluate risk from radiological contamination in buildings. The BPRG calculator assumes a higher exposure rate compared to RESRAD .~~and believes that it handles dust correctly~~. [*I wouldn't say that either model is correct]* Without a site-specific reason EPA cannot ~~Cannot~~ support RESRAD for dust at HPNS~~because it handles dust differently than the BPRG calculator~~.
The Navy believes that the BPRG calculator is overly conservative wrt risk from dust, providing numbers that are not achievable and not indicative of reasonable risk.
The EPA will ~~re-evaluate the Navy's risk numbers with updated inputs after discussions and will~~ provide updated ~~proposed~~ cleanup values using the BPRG calculator if it can support site-specific inputs in place of default values.

Action Items:

1. ~~EPA and~~ Navy – discuss internally whether the Navy believes that ~~the CSM to determine if~~ dust should not be considered at HPNS. If so, please provide a rationale and proposed approach to EPA. ~~Maybe a lower removable fraction is appropriate. (more discussion below). Meeting with both parties by Oct 30 to agree on CSM.~~ *[The BPRG dust PRGs we provided in August do not assume any particular removable fraction]*
2. EPA - evaluating ~~two~~ one of the BPRG inputs (potential loss of radon) and will get back to the Navy by Nov 3~~Oct 30 (1. Loss of Radon and 2. [If the Navy has questions about the other input we discussed yesterday (dissipation factor), please let me know.]~~
3. Navy – will follow up on EPA concern about ~~send~~ RESRAD slope factors used to estimate risk from fixed contamination on a building surface ~~method for converting dose to risk~~ to EPA by Oct 30
4. Navy – will review ingrowth and decay assumptions made in the Navy's October 2019 BPRG submittal and send any proposed changes ~~write up our understanding of how decay is handled in BPRG and send~~ to EPA – Oct 30
5. EPA – will send the updated factors from 2017 guidance to Navy – ~~Oct 22~~ by Oct 26

Follow up meeting by Nov *5 [My time is limited next week. I'm out tomorrow, next Tuesday, and next Friday, and have commitments from 7 – 2 next Wednesday and Thursday]*

~~**CSM –**~~ [*Some of these statements raise significant questions. Suggest not trying to summarize the CSM here*]
~~**Source of contamination** – Navy activities in buildings that used radiological constituents have ceased (i.e., the source of contamination is not replenishing).~~

~~**Remedial activities** – The Navy uses scanning equipment to measure gross fixed activity on a surface and remediates to the lowest remedial goal level for the radiological COCs. The removable fraction (if any) should represent all constituents being remediated to the lowest RG.~~

~~**Future exposure** – Industrial buildings will not house residential as is. Any future residential occupancy would by its very nature remove the potential for remaining contamination to expose residents to dust from Navy activities.~~